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March 10, 2000

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**Ex Parte Submission**

Magalie Roman Salas, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

RECEIVED  
MAR 10 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: *Application of SBC Communications Inc. Pursuant to Section 271  
of the Telecommunications Act of 1996 to Provide In-Region,  
InterLATA Services in Texas, CC Docket No. 00-4*

Dear Ms. Salas:

Enclosed for filing please find the following materials that respond to direct requests from Commission staff:

(1) A table documenting SWBT's implementation of each xDSL-related commitment undertaken at the December 16, 1999 Texas PUC Open Meeting. For each commitment, we have given a citation to the Open Meeting Transcript that references SWBT's agreement, as well as (non-exhaustive) citations to the record detailing SWBT's implementation. The record citations come from the SWBT/Covad Interconnection Agreement approved by the Texas PUC, the SWBT/Rhythms Interconnection Agreement approved by the Texas PUC, and/or an affidavit filed with the Texas PUC on December 15, 1999. Although the contractual language does not always mirror the phrasing contained in the Open Meeting Transcript, the cited contractual provisions bind SWBT to each commitment.

(2) Updated reject information for the EDI and LEX interfaces, with CLEC names removed, showing information for January 2000. A confidential version of this attachment, giving CLEC names, is being filed under seal.

(3) Spreadsheets providing a list of reject reason codes (including SD2044 - Valid Address) for CLECs during January 2000. Specific reject data for two carriers is being provided under seal.

No. of Copies rec'd 012  
List ABCDE

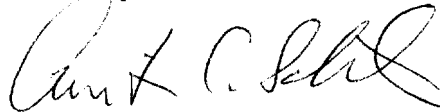
(4) A detailed description of the address edits and checks that are made in different SWBT OSS as an order flows through the systems.

(5) A discussion of performance results for Performance Measurements 70 and 74 for December 1999.

Commission staff also requested a further description of SWBT's application of Performance Measurement 73.1. This measurement captures all interconnection trunk orders for which SWBT misses the customer-desired due date or the 20 business day interval (whichever is longer) due to a lack of facilities. All such orders are captured and tracked, regardless of whether the lack of facilities condition exists for 1 day or for more than 90 days. However, under the current business rules, SWBT is only liable for payment of penalties on those held orders which are not completed within 90 days.

A copy of this letter is enclosed. Please let me know if you have any questions about this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Austin C. Schlick", written in a cursive style.

Austin C. Schlick

cc: Ms. Egler  
Ms. Stephens  
Ms. Wright  
Ms. Farroba, Texas PUC  
Ms. Heisler, DOJ  
ITS

**ATTACHMENT 1**

<b>SWBT Commitment</b>	<b>Citation to Open Meeting Transcript</b>	<b>Citation Establishing SWBT's Implementation</b>
SWBT Will Eliminate SFS	12/16/99 – page 12, line 18	SWBT - Covad Agreement, <sup>1</sup> § 9.2
Loops that Come Up Green – Under 12,000 Feet	12/16/99 – page 12, line 21	12/15/99 Aff. of Carol Chapman, <sup>2</sup> ¶¶ 17-23
Separate Pre-Order – Order – 2-Step	12/16/99 – page 13, line 8	12/15/99 Aff. of Carol Chapman, ¶¶ 8-11
Separate Pre-Order – Order – “As-Is”	12/16/99 – page 13, line 13	SWBT – Covad Agreement §§ 3.4, 4.5 et seq.; 12/15/99 Aff. of Carol Chapman, ¶¶ 14-16
SWBT Will Not Reject Loop Order for Loop Length	12/16/99 – page 13, line 21	SWBT – Covad Agreement §§ 3.4, 4.3, 4.5 et seq.; 12/15/99 Aff. of Carol Chapman, ¶ 15
SWBT Will Not Reject Loop Order For PSD	12/16/99 – page 13, line 21	SWBT – Covad Agreement §§ 2.4, 3.2, 4.3
Requests May Be Sent Via E-Mail	12/16/99 – page 14, line 3	SWBT – Rhythms Agreement <sup>3</sup> § 6.2.4; 12/15/99 Aff. of Carol Chapman, ¶ 24
No Requirement of PSD	12/16/99 – page 14, line 9	SWBT – Covad Agreement §§ 2.4, 3.2, 4.3
Ordering Process	12/16/99 – page 14 and 15	SWBT - Covad Agreement §§ 3.0, 4.0; SWBT - Rhythms Agreement § 6.2.4
“As-Is” Orders Will Be Delivered in “No Conditioning” Timeframe	12/16/99 – page 17, line 12	SWBT - Covad Agreement § 6.2
Acceptance Testing	12/16/99 – page 16, line 20	SWBT- Covad Agreement §7
Training	12/16/99 – page 17, line 1	12/15/99 Aff. Of Carol Chapman, ¶ 31 et seq.

<sup>1</sup>SWBT – Covad Interconnection Agreement, DSL Attachment (Reply App. B, Tab 1).

<sup>2</sup>Affidavit of Carol Chapman (Tex. PUC filed Dec. 15, 1999) (App. C, Tab 2014).

<sup>3</sup> SWBT - Rhythms Interconnection Agreement, DSL Attachment (Reply App. B, Tab 2).

## ATTACHMENT 2

CLEC	EDI	AUGUST '99			SEPTEMBER '99			OCTOBER '99			NOVEMBER '99			DECEMBER '99			JANUARY '00		
		# REJECT	# LSRS	% REJECT	# REJECT	# LSRS	% REJECT	# REJECT	# LSRS	% REJECT	# REJECT	# LSRS	% REJECT	# REJECT	# LSRS	% REJECT	# REJECT	# LSRS	% REJECT
CLEC A					26	102	25.5%	238	648	36.7%	434	1127	38.5%	499	1318	37.9%	537	1262	42.6%
CLEC B		2237	11859	18.9%	5416	44285	12.2%	4398	19708	22.3%	5760	18480	31.2%	5842	23329	25.0%	4179	16521	25.3%
CLEC C					46	49	93.9%	334	334	100.0%									
CLEC D		2	67	3.0%	2300	2347	98.0%										2	2	100.0%
CLEC E		874	2331	37.5%	701	2183	32.1%	941	1984	47.4%	817	1974	41.4%	502	1647	30.5%	879	3002	29.3%
CLEC F													57	87	65.5%	266	516	51.6%	
CLEC G		416	3550	11.7%	553	4591	12.0%	949	5919	16.0%	1367	5731	23.9%	914	4930	18.5%	1215	5913	20.6%
CLEC H													1	2	50.0%	192	540	35.6%	
CLEC I													1	3	33.3%	42	81	51.9%	
TOTAL		3529	17807	19.8%	9042	53557	16.9%	6860	28593	24.0%	8378	27312	30.7%	7816	31316	25.0%	7312	27837	26.3%
CLEC A	LEX																39	80	48.8%
CLEC B		265	1233	21.5%	128	755	17.0%	284	821	34.6%	315	882	35.7%	298	985	30.3%	331	1157	28.6%
CLEC C		12	21	57.1%	9	13	69.2%	2	8	25.0%	20	25	80.0%	6	10	60.0%	7	8	87.5%
CLEC D														7	16	43.8%	0	5	0.0%
CLEC E		9	122	7.4%	9	117	7.7%	51	134	38.1%	42	93	45.2%	46	108	42.6%	31	73	42.5%
CLEC F																	26	37	70.3%
CLEC G		1475	4289	34.4%	1578	4366	36.1%	4152	8684	47.8%	3266	7769	42.0%	2387	6011	39.7%	3996	9821	40.7%
CLEC H		42	98	42.9%	71	157	45.2%	95	164	57.9%	38	87	43.7%	401	585	68.5%	215	294	73.1%
CLEC I		50	328	15.2%	33	226	14.6%	47	176	26.7%	97	254	38.2%	86	242	35.5%	127	261	48.7%
CLEC J		498	1753	28.4%	329	1069	30.8%	311	648	48.0%	593	1263	47.0%	1061	2480	42.8%	2565	4253	60.3%
CLEC K														29	51	56.9%	7	41	17.1%
CLEC L																	177	395	44.8%
CLEC M		252	1289	19.6%	198	1103	18.0%	537	1038	51.7%	345	719	48.0%	452	747	60.5%	348	667	52.2%
CLEC N		22	77	28.6%	8	48	16.7%	15	39	38.5%	46	106	43.4%	17	80	21.3%	30	74	40.5%
CLEC O														6	8	75.0%	25	34	73.5%
CLEC P																	3	12	25.0%
CLEC Q														84	222	37.8%	131	362	36.2%
CLEC R		2	12	16.7%				0	3	0.0%	3	7	42.9%						
CLEC S		112	440	25.5%	153	509	30.1%	303	527	57.5%	394	669	58.9%	404	670	60.3%	300	521	57.6%
CLEC T																	241	424	56.8%
CLEC U		4	8	50.0%				13	16	81.3%	9	11	81.8%	13	20	65.0%	23	62	37.1%
CLEC V		272	989	27.5%	249	1168	21.3%	659	1310	50.3%	428	1173	36.5%	342	969	35.3%	374	998	37.5%
CLEC W																	27	42	64.3%
CLEC X		42	137	30.7%	16	63	25.4%	54	93	58.1%	34	59	57.6%	27	72	37.5%	12	22	54.5%
CLEC Y																	54	161	33.5%
CLEC Z		932	2717	34.3%	1091	3016	36.2%	2236	3729	60.0%	1136	2489	45.6%	1068	2132	50.1%	710	1600	44.4%
CLEC AA													483	998	48.4%	834	1530	54.5%	
CLEC BB	1	4	25.0%	0	1	0.0%	0	3	0.0%	2	6	33.3%				11	31	35.5%	
CLEC CC													7	9	77.8%	167	390	42.8%	
CLEC DD	206	1126	18.3%	179	765	23.4%	249	563	44.2%	117	447	39.6%	208	513	40.6%	69	198	34.9%	
CLEC EE	28	382	7.3%	154	544	28.3%	107	346	30.9%	379	971	39.0%	415	972	42.7%	346	891	38.8%	

# ATTACHMENT 2

CLEC FF	3	3	100.0%	13	22	59.1%						2	13	15.4%	27	38	71.1%	
CLEC GG												142	536	26.5%	143	615	23.3%	
CLEC HH	94	258	36.4%	115	553	20.8%	130	522	24.9%	137	625	21.9%	70	282	24.8%	232	424	54.7%
CLEC II	129	957	13.5%	118	923	12.8%	345	1467	23.5%	478	2378	20.1%	540	2719	19.9%	343	1672	20.5%
CLEC JJ															72	105	68.6%	
CLEC KK							7	36	19.4%	7	27	25.9%	20	111	18.0%	3	4	75.0%
CLEC LL	183	2310	7.9%	144	2291	6.3%	314	2122	14.8%	371	2009	18.5%	474	2442	19.4%	862	3345	25.8%
CLEC MM												4	9	44.4%	8	20	40.0%	
CLEC NN															27	39	69.2%	
CLEC OO	344	2110	16.3%	409	1811	22.6%	514	1562	32.9%	601	2424	24.8%	503	1684	29.9%	612	2280	26.8%
CLEC PP	179	822	21.8%	169	1086	15.6%	292	936	31.2%									
CLEC QQ										377	1055	35.7%	330	1022	32.3%	408	1114	36.6%
CLEC RR										106	284	37.3%	56	113	49.6%	19	67	28.4%
CLEC SS										8	12	66.7%	55	101	54.5%	32	55	58.2%
CLEC TT										59	132	44.7%						
CLEC UU												0	1	0.0%	41	68	60.3%	
CLEC VV	93	328	28.4%	57	230	24.8%	43	142	30.3%	15	46	32.6%	34	111	30.6%	29	111	26.1%
CLEC WW															91	431	21.1%	
CLEC XX												6	7	85.7%				
CLEC YY	10	89	11.2%	15	105	14.3%	13	76	17.1%	9	53	17.0%	4	41	9.8%	2	43	4.7%
TOTAL	5259	21902	24.0%	5245	20941	25.0%	10773	25165	42.8%	9492	26073	36.4%	10087	27092	37.2%	14177	34875	40.7%

# JANUARY 00 DATA

Combined Data for LEX & EDI

## TOTAL CLECs

**TOTAL LSRs**            **62712**  
**TOTAL REJECTS**    **21489**  
**% REJECTS**           **34.27%**

SD2044	INVALID ADDRESS	1837	8.55%
MR0023	INVALID ADDRESS	591	2.75%
MR0026	END USER NAME/TN / ADDRESS DO NOT MATCH	<u>551</u>	2.56%
	<b>Total Address Rejects:</b>	<b>2979</b>	<b>13.86%</b>
LS0063	DESIRED DUE DATE data must be today or future date	1854	8.63%
MR0041	INVALID FEATURES/LINE FEATURES/USOCs	787	3.66%
LS0630	ALL TNs ARE NOT ON SAME ACCOUNT	728	3.39%
MR0040	INVALID FEATURE ACTIVITY	516	2.40%
MR0001	DUPLICATE LSRs	437	2.03%
LS0125	LOCAL CONTACT data is invalid, valid format; 1-15 alph num	405	1.88%
LS0657	INVALID TN, TN MUST MATCH ECCKT ELEMENT 34 REQ TYP F OR M	358	1.67%
LS1113	ALL PORTED #/DISC#S ARE NOT ON SAME ACCOUNT	358	1.67%
SD2101	INVALID DATA XXXXX	337	1.57%
SD2030	FEATURE NOT FOUND IN UNE FEATURE TABLE; XXXXXX	333	1.55%
SD2017	INVALID FA FOR USOC AND WTN; X, XXXXX, XXXXXXXXXXXXX	306	1.42%
SD2079	LST INCORRECT FOR NPA NXX OF TN,XXXXXXXXXX	245	1.14%

**LFACs**

For conversion activity the 'D' and 'C' order will carry the RRSO FID for reuse of facilities. If the address is the same, the facilities are reused appropriately. (Note: The address on the 'C' order is populated from the service address information provided from the CLEC on the LSR. The address on the 'D' order is populated from the current address on the customer's service record (CSR). The address on the CSR is the exact data that the CLEC would be provided in the Pre-ordering interfaces.) Depending on the entries on the LSR, the following conditions occur during the provisioning process:

- a) If the addresses on the 'C' and 'D' orders are different but valid addresses in PREMIS, both service orders flow through SORD. Because the facilities reflected on the 'D' order cannot be reused at the new address specified on the 'C' order, the RRSO FID will be overridden. The two service orders will flow through all provisioning systems as independent service orders. The 'C' order appears to LFACs as new service and LFACs will attempt to assign new facilities. If new facilities are not available, the order will fall out for manual handling. The 'C' order then reflects 'CF' condition, which indicates a facilities problem. This is provided to the LSC for resolution. The LSC reviews the 'C' order for any related orders (e.g. RO, RRSO FIDs – 'D' order). For the related orders, the LSC will check if completed. If the related order completed, the 'D' order did flow on Due Date and disconnect the old service. The LSC will then issue 'N' order to re-establish service. If the related order is not completed, the LSC will validate that the address on the LSR is valid and if not, the LSC will provide an electronic jeopardy status to the originating CLEC for final disposition and change the due date to a future date for all related orders (includes 'D' order – no disruption of service). If the address is valid, the service address on the 'C' order will be changed to match the service address on the 'D' order to provide the facilities to be reused as intended.
- b) If the addresses on the 'C' and 'D' orders are the same, but the 'LOCs' (Location – Bldg, Apt, Suite) are valid but different, or not provided on the LSR, the 'C' and 'D' orders go into an edit condition termed FACS Lockout (FPLK status). In this case, LSC operations personnel will change the due date to a future date for all related orders and provide an electronic jeopardy status to the originating CLEC for final disposition.

For 'New' activity, LFACs will return an ESOI edit to the LSC if it is determined that the service address is invalid or 'LOC' information is required for facility assignment and the 'LOC' data is missing from the service order. LSC operations will change due date to future date for all related orders and provide an electronic jeopardy status to the originating CLEC for final disposition.

## **Performance Measures 70 and 74 for December 1999**

### Performance Measure 70 - Percentage of Trunk Blockage

A single CLEC's trunk group caused the blockage problem in the Houston region in December. In this particular case, the reason could be tracked to both SWBT and the CLEC. SWBT sent a TGSR later than normal. However, the responsibility of determining additional capacity rests jointly with SWBT and the CLEC, because the CLEC has a responsibility to monitor its own traffic. In this particular case, the situation occurred at an end office to end office two way trunk group, so the CLEC was able to monitor the traffic and blockage. The trunk at issue has been changed from a direct final to primary high usage, and is no longer experiencing blockage.

It is worth noting that SWBT's performance for the Houston market area was in parity the two months prior to December and is back in parity for January 2000. As a matter of fact, the blockage for CLECs in Houston in January was zero from the SWBT end office to CLEC end office, and .02% from the SWBT tandem to the CLEC end office. On an aggregated basis, PM 70 shows that SWBT is back in parity for January, as it was the two months prior to December as well.

### Performance Measure 74 – Average Delay Days for Missed Due Dates – Interconnection Trunks

In December for one market area, the South Texas Market area, SWBT did miss the performance measure. This does not appear to be the result of any systemic problems. In response, however, the LOC and related work groups have used conference calls, internal escalations, daily pending reports, and past-due order monitoring to work through issues causing missed due dates. This work has been effective in identifying potential delay causes, which allows both the LOC and market area installation personnel to attempt to address issues proactively, prior to due date. On those occasions where a proactive response is not possible, the methods described above assist in reducing the average installation interval.

It is worth noting that SWBT's performance for the South Texas market area was in parity for October and November 1999 and is back in parity for January 2000. In addition, as the statewide aggregated performance measures demonstrate, SWBT has been in parity for this measure for the most recent 12 months.